



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 155
Seattle, WA 98101

ENFORCEMENT &
COMPLIANCE ASSURANCE
DIVISION

**Clean Air Act - Section 112(r)
Risk Management Program
and EPCRA 312 – Tier II
Facility Inspection Report**

FACILITY INFORMATION:

Name: Sitka Sound Seafoods
Physical Address: 329 Katlian Street, Sitka, AK 99835
Phone Number: (907) 747-6662
Latitude/Longitude: 57.052722 / -135.335056
RMP Facility ID#: 1000 0018 2811
FRS ID#: 110000730193
EJ Concerns: Yes (Above 80%)

CONTACT INFORMATION (RMP Implementation):

Name: Tim Ryan
Phone Number: (907) 747-6662
E-mail: tryan@npsi.us

EMERGENCY CONTACT INFORMATION:

Name: Tim Ryan
Phone (24-hr): (907) 738-6660
E-mail: tryan@npsi.us
Website: www.northpacificseafoods.com

TRIP DETAILS:

Inspection Date: September 20, 2022
Inspection Time: 0900 hours through 1600 hours
EPA Inspection Team:
Peter Phillips, EPA Region 10, Lead RMP Inspector
Terry Garcia, EPA Region 10, RMP Inspector
Edward Johannes, EPA Region 10, RMP Inspector
Mike Wolski, Weston Solutions, Inc., EPA START Contractor

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: June 22, 2003
Date of Latest Update: August 22, 2019

Process (Program 1, 2, 3) as reported in RMP:

Process ID	Description	Process Chemical ID	NAICS Code	Program Level	Chemical Name CAS Number	Quantity (lbs)
1000102584	Refrigeration System	1000128535	31171	3	Ammonia, Anhydrous (7664-41-7)	22,834

PURPOSE:

The purpose of this inspection was to determine whether this facility is in compliance with Section 112(r) of the Clean Air Act (CAA) and Title 40 of the Code of Federal Regulations (CFR) Part 68, Chemical Accident Prevention Provisions.

- The facility has been previously inspected in the past 5 years: No ☒ Yes ☐
- The facility is High Risk: No ☒ Yes ☐
- Joint EPCRA inspection: No ☒ Yes ☐

CAA Title V Air Permit:

Does the facility have a CAA Title V Permit? No ☒ Yes ☐

RELEASE/ACCIDENT HISTORY:

Did the facility have a reportable release in the past 5 years? No ☒ Yes ☐

EPCRA TIER II REPORTING:

Did the facility submit the 2022 Tier II report to the SERC? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: 2/10/2022

Did the facility submit a Tier II to the LEPC and local fire department? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: 2/10/2022

INSPECTION ENTRY:

Peter Phillips led the EPA Inspection Team (EPA) in the inspection entry at the Sitka Sound Seafoods facility in Sitka, Alaska (the facility). Alaska Department of Environmental Conservation (ADEC) representative Kathy Shea accompanied EPA during the inspection. EPA arrived at the facility at 0900 hours and was joined by the following facility personnel:

Name	Title
Cassady Surfleet	EHS Intern
Margaret DeGravelle	Environmental Compliance Officer
Gordon L. Grant	EHS Coordinator
Kendall Didrickson	Chief Engineer
Bill Grant	Plant Manager

Was a state/county/or local emergency representative present? No ☐ Yes ☒

If Yes, Name and Title of Representative: Kathy Shea, ADEC

The facility is a first responder: No ☒ Yes ☐

If No, Responding Agency: Sitka Fire Department

Facility representatives escorted EPA to a conference room located in the facility's office building. Lead inspector, Peter Phillips, introduced all parties present, provided a summary of the risk management program (RMP), and explained the purpose of the visit. Each EPA Inspector presented his/her credentials. Facility representatives Margaret DeGravelle and others at the meeting gave a brief description of the facility, operations, and personal protective equipment (PPE) required for the tour.

Prior to the inspection, EPA sent a certified notice of inspection letter to the facility informing them of the CAA Section 112(r)(6)(L) requirement that facility employees and employee representatives (such as a union representative) have the right to participate in the RMP inspection, that a copy of the letter must be provided to the employee representative(s) and the letter posted in a manner accessible to employees in the facility.

The facility is unionized: No ☒ Yes ☐

An employee representative present during the facility visit: No ☒ Yes ☐

GENERAL INFORMATION: The facility is regulated under the RMP as a Level 3 facility and is operated by Sitka Sounds Seafoods, a subsidiary of North Pacific Seafoods. The facility produces fresh and frozen seafood products such as salmon, herring, crab, herring roe, halibut, and black cod, and utilizes an anhydrous ammonia refrigeration/freezing system to process and preserve the seafood products. Two engine rooms support the facility's single refrigeration system, which utilizes 22,834 pounds of anhydrous ammonia. Two high pressure receiver (HPR) tanks for the refrigeration system are located at an exterior area of the facility property.

The facility was built in the late 1960s and began seafood processing operations as Sitka Sounds Seafoods. Operations expanded in the late 1980s and early 1990s, and North Pacific Seafoods fully acquired the facility in 1997. The facility added an Icehouse in 2018. There are 170-180 full time employees on site during peak operations, including three operators who oversee the RMP regulated processes at the facility. Staff supports the ammonia refrigeration system 24 hours a day, seven days a week while the facility is in operation.

ON-SITE OBSERVATIONS:

EPA and ADEC toured the facility from approximately 0900 hours to 1600 hours, escorted by facility representatives. EPA inspected exterior and interior areas of the facility, including the Icehouse, Bait Room, one Cool Room, Engine Room 1, Engine Room 2, blast freezers and plate freezer areas, Holding Room 1, and other refrigeration system components at exterior areas of the facility property.

EPA observed exterior overhead ammonia lines which carry anhydrous ammonia to different areas of the facility (photos 1-2) and noted a windsock at the facility exterior (photo 3).

EPA inspected the facility Icehouse. Exterior areas of the Icehouse include an emergency stop (E-Stop) for refrigeration system processes (photo 4) and hazard communication signage on the Icehouse access door (photo 5). EPA inspected refrigeration system components inside the Icehouse including ammonia lines, ammonia detectors, E-Stops, and ice machines (photos 6-13).

EPA inspected climate-controlled rooms supported by the facility refrigeration system. A fifteen ton evaporator cools the Bait House (photo 14), and a 7.5 ton evaporator supports the Cold Room (photo 15).

EPA inspected Engine Room 1, which is locked and accessible to select authorized personnel. EPA observed a hazard communication signage posted on the access door and an shower/eye wash station at the exterior of Engine Room 1 (photo 16), as well an emergency vent switch, emergency cross over, three emergency shunt trips, and an ammonia alarm (photo 17). EPA observed an shower/eye wash station inside Engine Room 1 (photo 18). Refrigeration system components in Engine Room 1 include five compressors, ammonia lines and valves, one ammonia detector and alarm, the refrigeration system control panel (photos 19-25), and one low pressure receiver tank (LPR). Pressure release valve (PRV) tags showed PRVs as installed in August 2020 (photo 24). A control panel in Engine Room 1 controls the refrigeration system (photo 26), and maintenance is logged and managed on hardcopy forms (photo 27). Two inlet vents and two outlet vents provide ventilation to Engine Room 1 (photo 28).

Two high pressure receiver tanks (HPRs) located at the exterior of the facility support the facility refrigeration system. The first HPR designated as HPR 1 supports both engine rooms and the single refrigeration system at the facility (photo 29). The second HPR designated as HPR 2 provides additional storage for anhydrous ammonia (photo 30).

EPA inspected Engine Room 2, which features two access doors accessible by select authorized personnel (photos 31-32). EPA observed a hazard communication signage posted on both access doors, as well as an shower/eye wash station, emergency switches for refrigeration and ventilation, and an ammonia alarm at the exterior of Engine Room 2 (photo 32). One inlet vent and one outlet vent provide ventilation for Engine Room 2 (photo 33). An emergency shunt trip supporting all facility operations is located at the exterior of Engine Room 2 (photo 34). A second shower/eye wash station is located inside Engine Room 2 (photo 35). Refrigeration system components in Engine Room 2 include two compressors, ammonia piping and valves, and an ammonia detector (photos 36-39). EPA observed the ammonia detector in Engine Room 2 as out of operation (photo 38), and service tags on pressure relief valves as dated January 2020 (photo 39). Facility representatives stated that a repair order was in place for the ammonia detector.

EPA inspected several refrigeration system components and safety features at exterior areas of the facility near Engine Room 2, including the facility ammonia valve manifold and crossover piping (photo 40), an exterior shower/eye wash station and exterior ammonia alarm (photos 41-42), and the accumulator and associated pump shutdown for the facility (photo 43). EPA also observed three evaporator condenser units (photo 53), ammonia piping and valves supporting the evaporator units (photo 54), and the vent to atmosphere pipe from Engine Room 2 (photo 55).

EPA inspected interior areas of the facility where blast freezers and plate freezers process seafoods. The facility operates eight blast freezers, six of which are supported by 60-ton evaporators and two supported by 40-ton evaporators (photos 47-49). Two plate freezers at the facility provide flash freezing of seafoods (photos 48). EPA inspected freezer system components including ammonia piping, compressors, a system control panel, and an ammonia leak detector (photos 48-52). The plate freezer control panel is located on a mezzanine in the plate freezer area (photo 50), and ammonia detection components are located at a lower level in the room.

EPA inspected the Holding Room which holds finished seafood products at minus 15 degrees Fahrenheit (photos 51-52).

EPA also toured the welding gas storage area holding chemicals reportable under Tier II Rule. EPA observed argon, oxygen, and acetylene cylinders as properly labeled and secured (photo 56).

Photographs were taken of the anhydrous ammonia process. Photographs taken during the inspection are included in Attachment A to this report.

After touring the RMP-covered process areas at the facility, EPA returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to Kendall Didrickson, Bill Grant, Gordon Grant, Margaret DeGrevelle, Cassady Surfleet and Eric Pangburn, with Kathy Shea of ADEC also present.

INFORMATION COLLECTED FROM FACILITY:

1. North Pacific Seafoods, Inc /Sitka Sounds Seafoods SPCC Plan Attachment 7
2. Compliance Audit April 2018 Recommendation Table
3. Management Responsibilities for RMP/PSM
4. Documentation of Employee Participation (blank form)
5. Invoice (Double Kold/Sitka Sounds Seafood) for 5-year Mechanical Inspection dated 9/22/22
6. Email Quote for 5-year Mechanical Audit dated 9/9/22

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

1. **Mechanical Integrity:** Sitka Sound Seafoods was unable to provide training documentation for each employee involved in maintaining the on-going integrity of process equipment. [68.73(c)].
2. **Compliance Audits:** Sitka Sound Seafoods' 2018 Compliance Audit report was not certified for evaluating compliance. [68.79(a)].
3. **Compliance Audits:** Sitka Sound Seafoods' 2018 Compliance Audit report did not document an appropriate response to each of the findings (approximately 18 items) of the audit and document that deficiencies have been corrected. [68.79(d)].
4. **Contractors:** Sitka Sound Seafoods was unable to provide documentation on evaluating information regarding the contract owner or operator's safety performance and programs when selecting a contractor such as Doubl-Kold and Sitka Electric. [68.87(b)(1)].
5. **Emergency Response:** Sitka Sound Seafoods was unable to provide emergency response coordination documentation with local emergency responders for the years 2018, 2019, 2020 and 2021. [68.93].

DOCUMENTS REQUESTED INCLUDED IN REPORT:

The following documents were requested during or after the inspection but are included in this report. These documents were reviewed to determine compliance with Section 112(r) of the Clean Air Act.

The following information from the facility was received via email on 10/12/2022.

Document Requested	Status
PSI – Process chemistry	Provided and evaluated as satisfactory
PSI – Safe upper and lower limits of equipment	Provided and evaluated as satisfactory
PSI – Evaluation of the consequences of deviation	Provided and evaluated as satisfactory
PSI – a discussion of safety systems	Provided and evaluated as satisfactory
PHA – 15 items (purchase labels) scheduled for 2020	Purchase order submitted.
ER – coordination meetings since 2021	Not provided
Training summary form completed.	Completed
SOP – Safety Systems and Functions 68.69(a)(4)	Issue was clarified
Engine Room 2 Detector – Non-functional: provide documentation to show equipment orders in progress	Purchase order submitted.

INSPECTION REPORT CERTIFICATION:

This is to certify that I, Peter Phillips, was the lead inspector at this facility and that I have verified the accuracy of the observations in this inspection report:

PETER PHILLIPS
(Affiliate)

Digitally signed by PETER
PHILLIPS (Affiliate)
Date: 2022.12.20 10:46:15 -08'00'

Inspector Signature

JAVIER MORALES

Digitally signed by JAVIER
MORALES
Date: 2022.12.20 11:24:18 -08'00'

RMP Coordinator/Approval

ERIN WILLIAMS

Digitally signed by ERIN WILLIAMS
Date: 2022.12.21 11:57:38 -08'00'

EPCRA Coordinator/Approval

Jennifer A Sullivan

Digitally signed by Jennifer A
Sullivan
Date: 2022.12.21 13:56:33 -08'00'

Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: Sitka Sound Seafoods

City, State: Sitka , Alaska

Photographer: Mike Wolski

File	Photo Layout ID	Date	Time	Description
Photo1.jpg	1	9/20/2022	10:23 a.m.	Facility Exterior - Overhead ammonia lines
Photo2.jpg	2	9/20/2022	10:24 a.m.	Facility Exterior - Overhead ammonia lines and windsock
Photo3.jpg	3	9/20/2022	10:24 a.m.	Facility Exterior - Windsock
Photo4.jpg	4	9/20/2022	10:26 a.m.	Facility Exterior/Icehouse - Emergency stop (E-Stop) for refrigeration system
Photo5.jpg	5	9/20/2022	10:29 a.m.	Facility Exterior/Icehouse - Hazard communication signage at Icehouse access door with chemical and safety signs
Photo6.jpg	6	9/20/2022	10:29 a.m.	Icehouse - Ammonia lines inside Icehouse
Photo7.jpg	7	9/20/2022	10:30 a.m.	Icehouse - Ammonia lines and ammonia detectors
Photo8.jpg	8	9/20/2022	10:30 a.m.	Icehouse - Ammonia lines and four ice machines
Photo9.jpg	9	9/20/2022	10:31 a.m.	Icehouse - Ammonia lines and detectors
Photo10.jpg	10	9/20/2022	10:32 a.m.	Icehouse - Refrigeration system control panel and E-Stop
Photo11.jpg	11	9/20/2022	10:34 a.m.	Icehouse - Ice machines with E-Stops
Photo12.jpg	12	9/20/2022	10:34 a.m.	Icehouse - Ice machine State of Alaska inspection tags, manufacture date 2018
Photo13.jpg	13	9/20/2022	10:34 a.m.	Icehouse - Fire extinguisher
Photo14.jpg	14	9/20/2022	10:37 a.m.	Bait House - 15-ton evaporator
Photo15.jpg	15	9/20/2022	10:41 a.m.	Cool Room - 7.5-ton evaporator
Photo16.jpg	16	9/20/2022	10:44 a.m.	Facility Exterior/Engine Room 1 - Locked access door with hazard communication signage, exterior shower/eye wash station
Photo17.jpg	17	9/20/2022	10:44 a.m.	Facility Exterior/Engine Room 1 - Emergency vent switches, emergency shunt trips, and ammonia alarm
Photo18.jpg	18	9/20/2022	10:49 a.m.	Engine Room 1 - shower/eye wash station
Photo19.jpg	19	9/20/2022	10:51 a.m.	Engine Room 1 - Pumps and ammonia piping
Photo20.jpg	20	9/20/2022	10:52 a.m.	Engine Room 1 - Ammonia compressor equipment and piping
Photo21.jpg	21	9/20/2022	10:53 a.m.	Engine Room 1 - Compressor
Photo22.jpg	22	9/20/2022	10:54 a.m.	Engine Room 1 - Compressor and piping
Photo23.jpg	23	9/20/2022	10:55 a.m.	Engine Room 1 - Overview of engine room, ammonia piping, and compressors
Photo24.jpg	24	9/20/2022	10:56 a.m.	Engine Room 1 - Pressure relief valves (PRVs) installed in August 2020
Photo25.jpg	25	9/20/2022	10:57 a.m.	Engine Room 1 - Ammonia detector and alarm
Photo26.jpg	26	9/20/2022	10:57 a.m.	Engine Room 1 - Control panel for refrigeration system

File	Photo Layout ID	Date	Time	Description
Photo27.jpg	27	9/20/2022	10:58 a.m.	Engine Room 1 - Maintenance log for freezers
Photo28.jpg	28	9/20/2022	10:59 a.m.	Engine Room 1 - Ventilation, there are two inlet and two outlet vents
Photo29.jpg	29	9/20/2022	11:04 a.m.	Facility Exterior - High pressure receiver tank (HPR) HPR 1 with associated king valves and ammonia piping
Photo30.jpg	30	9/20/2022	11:05 a.m.	Facility Exterior - HPR 2 (behind wall) with associated king valves and ammonia piping
Photo31.jpg	31	9/20/2022	11:05 a.m.	Facility Exterior/Engine Room 2 - Access door for Engine Room 2 with Hazard communication signage and ammonia alarm
Photo32.jpg	32	9/20/2022	11:05 a.m.	Facility Exterior/Engine Room 2 - Access door to Engine Room 2 with Hazard communication signage, shower/eye wash station, emergency switches for vent and refrigeration system, ammonia alarm, and vent
Photo33.jpg	33	9/20/2022	11:07 a.m.	Facility Exterior/Engine Room 2 - Inlet and outlet vents for Engine Room 2
Photo34.jpg	34	9/20/2022	11:08 a.m.	Facility Exterior/Engine Room 2 - Facility emergency shunt trip
Photo35.jpg	35	9/20/2022	11:09 a.m.	Engine Room 2 - Emergency eyewash station
Photo36.jpg	36	9/20/2022	11:09 a.m.	Engine Room 2 - One of two compressors
Photo37.jpg	37	9/20/2022	11:10 a.m.	Engine Room 2 - Ammonia piping
Photo38.jpg	38	9/20/2022	11:10 a.m.	Engine Room 2 - Ammonia detector, offline and repair order placed, repair pending
Photo39.jpg	39	9/20/2022	11:11 a.m.	Engine Room 2 - Pressure relief valves installed January 2020
Photo40.jpg	40	9/20/2022	11:14 a.m.	Facility Exterior/Engine Room 2 - Ammonia valve manifold and crossover piping
Photo41.jpg	41	9/20/2022	11:12 a.m.	Facility Exterior - Exterior shower/eye wash station
Photo42.jpg	42	9/20/2022	11:12 a.m.	Facility Exterior - Exterior ammonia alarm
Photo43.jpg	43	9/20/2022	11:19 a.m.	Facility Exterior - Accumulator and pump shutdown (lower left of photo)
Photo44.jpg	44	9/20/2022	11:23 a.m.	Facility Interior - Blast freezers, eight total
Photo45.jpg	45	9/20/2022	11:21 a.m.	Facility Interior - Blast freezers 7 and 8
Photo46.jpg	46	9/20/2022	11:24 a.m.	Facility InteriorBlast freezer evaporators
Photo47.jpg	47	9/20/2022	11:28 a.m.	Facility Interior - Plate freezers, two total
Photo48.jpg	48	9/20/2022	11:24 a.m.	Facility Interior - Ammonia piping to plate freezers
Photo49.jpg	49	9/20/2022	11:28 a.m.	Facility Interior - Plate freezer compressors
Photo50.jpg	50	9/20/2022	11:24 a.m.	Facility Interior/Plate Freezer Area Mezzanine - Plate freezers control panel and ammonia leak detector
Photo51.jpg	51	9/20/2022	11:35 a.m.	Facility Interior - Inside Holding Room 1
Photo52.jpg	52	9/20/2022	11:35 a.m.	Facility Interior - Holding Room
Photo53.jpg	53	9/20/2022	11:39 a.m.	Facility Exterior - Evaporator condenser 2, one of three evaporator condensers at the facility

File	Photo Layout ID	Date	Time	Description
Photo54.jpg	54	9/20/2022	11:45 a.m.	Facility Exterior - Valve tags on evaporator piping
Photo55.jpg	55	9/20/2022	11:43 a.m.	Facility Exterior - Vent to atmosphere pipe at Engine Room 2 exterior
Photo56.jpg	56	9/20/2022	11:48 a.m.	Facility Exterior - Gas storage for welding: oxygen, argon, and acetylene